REMARKS

Independent claims 1, 6, 7, 13, 16, and 19 are amended to clarify the invention, with support found in FIGs. 1 and 2 and the accompanying description. Claims 1-4, 6-10, and 13-21 are pending in the application. Reconsideration and allowance of the application are respectfully requested.

The Office Action does not establish that claims 1-4, 6-10 and 13-21 are unpatentable under 35 USC §103(a) over "Zalewski" (U.S. Patent No. 6,647,508 to Zalewski et al.) in view of "Stedman" (U.S. Patent No. 5,968,119 to Stedman et al.). The rejection is respectfully traversed because the Office Action does not show that all the limitations are suggested by the references and does not provide a proper motivation for modifying the teachings of Zalewski with teachings of Stedman.

Independent claims 1, 6, 7, 13, and 16 are amended to clarify that the management interface processor is implemented on a computer system other than the computer systems that host the one or more instances of the system operations program. This flexibility is not provided by Stedman. Specifically, Stedman's single server computer hosts the server application framework (which is alleged to correspond to the claimed management interface processor), and Stedman's software-implemented server application framework includes the host extensions (which are alleged to correspond to the instances of the system operations program). The amendments to the claims further clarify that the management interface processor does not host the instances of the system operations program and that the instances of the system operations program are coupled to the logical console objects via the network. Thus, the present invention provides capabilities and flexibility that Stedman cannot provide, and these features clearly distinguish over the teachings of the Zalewski-Stedman combination.

As to independent claim 19, Stedman shows and apparently describes only a single server computer that hosts the single server application framework, and this teaching does not suggest the limitations of the claim. The claim limitations clearly indicate that the instances of the system operations program are initiated on at least two of the computer systems, respectively, and each instance of the system operations program is coupled to a respective partition. The management interface processor is

implemented on a computer system other than the at least two computer systems on which the at least two instances of the system operations program are initiated. Thus, Stedmans' single server computer, which is alleged to correspond to the claimed operations server computer system of claim 1, does not suggest the two instances of the system operations program initiated on at least two computer systems as set forth in claim 19.

Claim 19 further includes the limitations of, in response to a connection request that specifies an instance of the system operations program that is not hosted on the computer system hosting the operations interface program at which the connection request was received, returning to the instance of the console view that sent the connection request, a code that identifies the one of the computer systems that hosts the instance of the system operations program specified in the connection request. The Office Action does not cite any portion of the Zalewski-Stedman combination as corresponding to these limitations. Nor does the combination appear to suggest these limitations. Thus, all the limitations of claim 19 are not addressed by the Office Action, and the Zalewski-Stedman combination does not appear to suggest all the limitations.

The alleged motivation for modifying Zalewski with Stedman is improper. The alleged motivation states that "it would have been obvious ... to modify the methods/systems of Zalewski with the teachings of Stedman, in order to provide an improved access method or system avoiding the limitations of the multiplexer 228..." It is respectfully submitted that there is no apparent evidence presented that demonstrates Zalewski's system provides a level of access that is less than desirable. Furthermore, there is no evidence presented to support the rationale that Zalewski's "inclusion of a primitive consolidated console for the system partitions denotes a need to simplify the access to the different partitions; at the same time motivates the exploration of the art providing simplified access mechanisms for a plurality of host instances." If evidence exists that shows Zalewski has an actual need to simplify access, beyond that which Zalewski's described approach already provides, then presentation of that evidence is respectfully requested. Otherwise, the alleged motivation is conclusory and should be withdrawn.

Claims 2, 8, 14, and 17 depend from claims 1, 7, 13, and 16, respectively, and are not shown to be unpatentable for at least the reasons set forth above.

Claims 3, 9, 15, and 18 depend from claims 1, 7, 13, and 16, respectively, and are not shown to be unpatentable for at least the reasons set forth above.

Claims 4 and 10 depend from claims 1 and 7, respectively, and are not shown to be unpatentable for at least the reasons set forth above.

The rejection of claims 1-18 over the Zalewski-Stedman combination should be withdrawn because the Office Action fails to establish a *prima facie* case of obviousness.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above.

No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (USYS.020PA).

Respectfully submitted,

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